

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

*IN RE: AVON ANTI-AGING SKINCARE
CREAMS AND PRODUCTS MARKETING
AND SALES PRACTICES LITIGATION*

Case No.: 1:13-cv-00150-JPO

**PLAINTIFFS' MOTION TO STRIKE DECLARATIONS,
EXPERT OPINIONS AND LAY OPINIONS**

Plaintiffs Monique Quintana, Lorena Trujillo, and Tara Tillman (collectively, "Plaintiffs") respectfully move this Court for an Order striking the declarations of Uma Santhanam, Jennifer Weinstein, Sylvie Biragnet, and Rosa Aguilar, each of which was submitted by Defendant Avon Products, Inc. ("Defendant") in connection with its Memorandum in Opposition to Plaintiffs' Motion for Class Certification (Dkt. No. 155), and barring those witnesses from testifying at trial. As explained in the accompanying memorandum of law in support of this motion, each of the foregoing declarants offer unreliable and irrelevant expert (Santhanam, Weinstein, Biragnet) or baseless and unhelpful lay (Weinstein, Biragnet) opinion testimony, or offer testimony that lacks credibility (Aguilar).

WHEREFORE, Plaintiffs respectfully request that the Court grant their motion and: strike the declaration of Uma Santhanam and her testimony and bar Dr. Santhanam from testifying at trial; strike the declaration of Jennifer Weinstein to the extent it offers lay or opinion testimony and bar Ms Weinstein from providing such opinion testimony at trial; strike the declaration of Sylvie Biragnet to the extent it offers lay or opinion testimony and bar Ms. Biragnet from providing such opinion testimony at trial; and strike the declaration of Rosa Aguilar.

Dated: March 30, 2015

Respectfully submitted,

/s/ John C. Kairis

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